

US District Court
for the
District of Massachusetts

Michael Baer, plaintiff
^{vs}
Michael Maloney, et al
defendants

C.A # 05-11045-GAO

Plaintiff's Response TO
Defendants first set of
Interrogatories

Interrogatory #1.

Plaintiff objects to this paragraph until the court assigns counsel and this time he cannot respond to this question.

Interrogatory #2

The complaint speaks for itself, see discovery documents that list the names of other prisoners.

Interrogatory #3

Plaintiff DENIES this allegation to its fullest.

Interrogatory #4.

See Interrogatory #1

Interrogatory #5

Plaintiff is awaiting on Counsel to be assigned to this case and at this time ~~they~~ objects and cannot respond.

Interrogatory #6.

Witness list will be provided in a timely manner, before any trial date is set.

Interrogatory #7.

Inmate Albert Ford #W53215, who provided the affidavit for me, until counsel is ~~provided~~ assigned to this case plaintiff objects to any DOC lawyer and/or officials approaching this inmate.

Interrogatory #8

See response to Interrogatory #1.

Interrogatory #9.

Plaintiff objects on the grounds that a response is not needed at this time.

Interrogatory #10

The Complaint speaks for itself.

Interrogatory #11

Review your own use of force package & CMRs to determine your authority and Plaintiff Reserved the right to amend his complaint.

Interrogatory #12

Plaintiff objects at this time until counsel is assigned.

Interrogatory #13.

See Response to Interrogatory #12

Respectfully submitted,

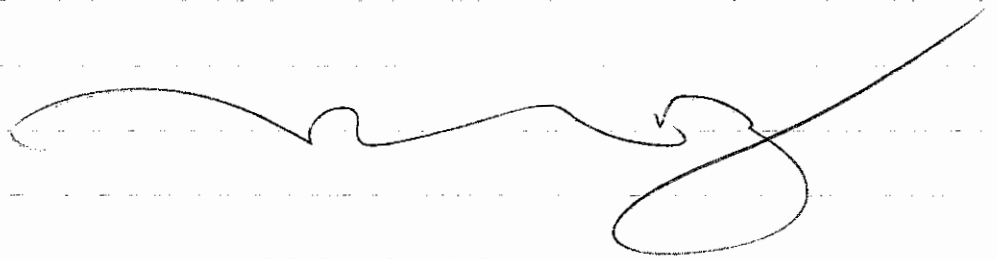


Michael Baer

Date 3/23/06

Certificate of Service

I, Michael Baer, hereby certify on
This 23 day of March, 2006, I served
a True Copy of the foregoing upon the
assigned Counsel, Margaret Melville.



Michael Baer #W69027
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So Walpole, MA
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